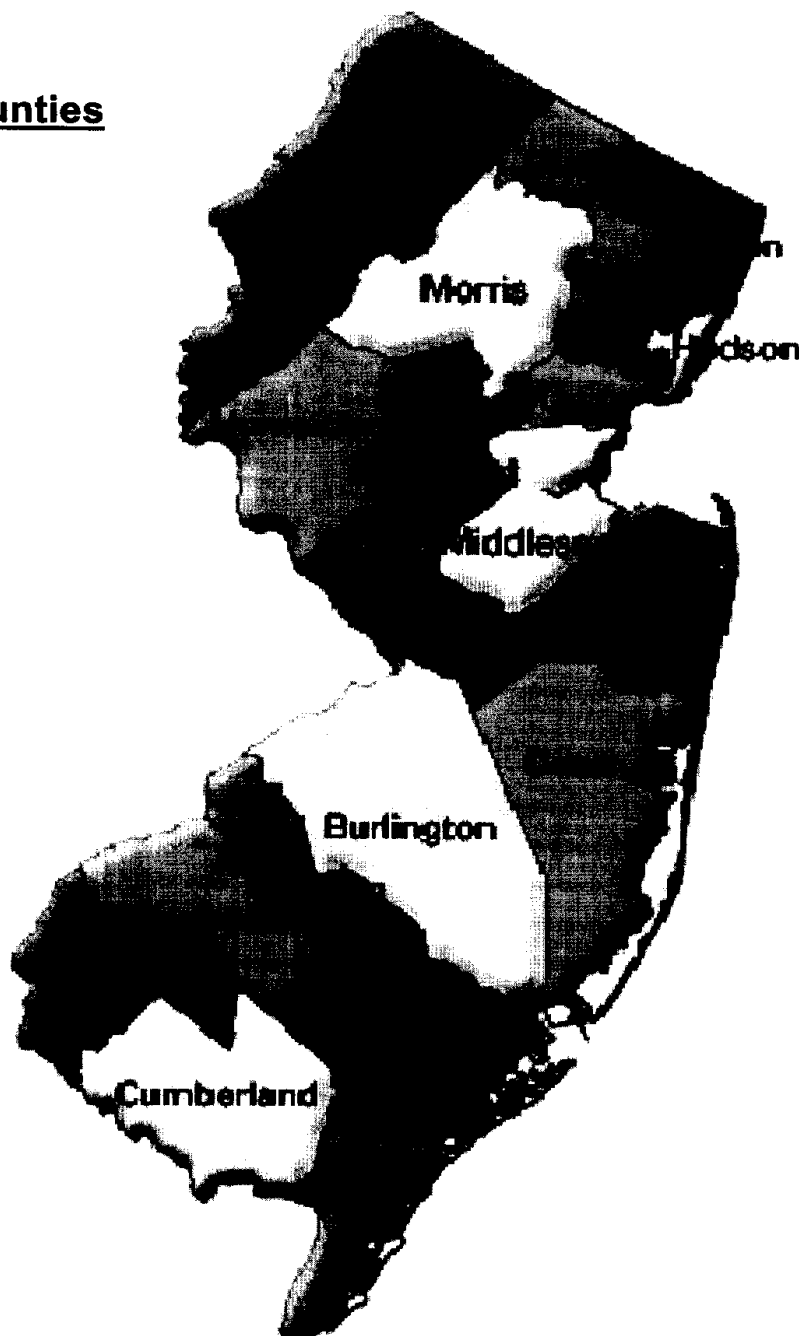


New Jersey Counties

NJ Counties



Sources: <http://www.rce.rutgers.edu/images/maps/nj-counties.gif> . NJ BPU Docket No. TO03090705.

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[illegible]

Wire Centers in Density Zone 3				
Wire Center	Location	UNE-P	Total Lines in Wire Center	UNE-P as % of Total Lines
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				

Sources: Column A: Verizon response to RPA 2-97. Column B: Verizon responses to RPA 2-93 and 2-96. Column C: calculated. NJ BPU Docket No. TO03090705.

**Mass Market Local Competition in Verizon NJ's Wire Centers Is
Entirely UNE-P-Based**

**Newark MSA
Wire Center**

Location Name

UNE-P Lines

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Camden MSA
Wire Center**

Location Name

UNE-P Lines

[REDACTED]

Total UNE-P Lines

Note: Of the 96 wire centers comprising verizon NJ's non-impairment markets,
nearly ____ have no UNE-Loop activity.

Sources: Verizon responses to RPA 2-92, 2-96, and 2-97. NJ BPU Docket No.
TO03090705.

**UNE-Loop Presence Is Negligible or Non-Existent in Many Wire Centers in
Verizon NJ's Proposed Non-Impairment Region**

Newark MSA

**Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in
the Specified Range**

Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range									
Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									
[REDACTED]									

Camden MSA

**Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in
 the Specified Range**

Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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Totals

Sources: NJ BPU Docket No. TO03090705. Verizon responses to RPA 2-92 and RPA 2-104.

Note: ___ of the 96 wire centers in Verizon NJ's proposed non-impairment markets have no UNE-Loops; ___ wire centers have between 1 and 10 UNE-Loops; ___ wire centers have more than 10 and fewer than 100 UNE-Loops; ___ wire centers have 100 or more UNE-Loops.

**UNE-Loop Presence Is Negligible or Non-Existent in Many Wire Centers in
Verizon NJ's Proposed Non-Impairment Region: Sorted by County**

Newark MSA			Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range							Total Loops
County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	
[REDACTED]										
[REDACTED]										
[REDACTED]										
[REDACTED]										
[REDACTED]										
[REDACTED]										
[REDACTED]										

Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in the Specified Range										
County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops

Camden MSA

**Number of Unbundled Analog Loops Where the Total Unbundled Analog Loops at each Address is in
 the Specified Range**

County	Wire Center	Location Name	1-3 Loops	4-8 Loops	9-12 Loops	13-16 Loops	17-20 Loops	21-24 Loops	> 24 Loops	Total Loops
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[REDACTED]										
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[REDACTED]										
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[REDACTED]										
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[REDACTED]										
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Totals

Sources: Verizon responses to RPA 2-92 and RPA 2-104. NJ BPU Docket No. TO03090705.

Note: ___ of the 96 wire centers in Verizon NJ's proposed non-impairment markets have no UNE-Loops; ___ wire centers have between 1 and 10 loops; and ___ wire centers have more than 10 and fewer than 100 UNE-Loops.

**Residential Customers Rely on CLECs' UNE-P Based Entry For
Competitive Choice**

Wire Centers in Density Zones 1 and 2 - Newark MSA			
Wire Center	A	B	C
	UNE-P Residential	Verizon Retail Residential	UNE-P as a Percentage of Total

Wire Center	UNE-P Residential	Verizon Retail Residential	UNE-P as a Percentage of Total
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
Total			

Wire Centers in Density Zones 1 and 2 - Camden MSA

Wire Center	UNE-P as a		Percentage of
	UNE-P	Verizon Retail	
	Residential	Residential	Total
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
Total			

Wire Centers in Density Zone 3 - Camden MSA

[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]			
Total			

Totals by Proposed Verizon NJ Non-Impairment Status MSAs Combined			
	UNE-P	Verizon Retail	% UNE-P
Density Zones 1 and 2			
Density Zone 3			

Sources: Column A: Verizon response to Joint Parties 1-2. Column B: Verizon response to RPA 2-93. Column C: calculated. NJ BPU Docket No. TO03090705.

**Most of the CLECs in the Line Count Study Do Not Provide UNE-
Loop-Based Service to the Entire Mass Market**

	A	B	C
	Residential and Business Service	UNE-Loops	
CLEC		Total	Residential
[REDACTED]			
[REDACTED]			
Total UNE-Loops to Residences			
Sources: Columns A and C: CLEC responses to RPA-3. Column B: Verizon response to RPA 2-96, CLEC response to RPA-3. NJ BPU Docket No. TO03090705.			
Notes: <i>Proprietary.</i>			

**Few Residential Customers in Verizon NJ's Proposed
Non-Impairment Markets Are Served by Self-Provisioning CLECs**

New York-Newark-Edison, NY-NJ-PA Metropolitan Statistical Area				
Wire Center	Location	A	B	C
		Total Verizon Retail Residential Lines	Mass Market UNE-Loops Residential	Total

Wire Center	Location	Total Verizon Retail Residential Lines	Mass Market UNE-Loops	
			Residential	Total

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area

Wire Center	Location	Total Verizon Retail Residential Lines	Mass Market UNE-Loops	
			Residential	Total

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Totals

Sources: Wire Centers: Verizon response to RPA 2-92. Column A: Verizon response to RPA 2-93. Column B: CLEC responses to RPA 3. Column C: Verizon Response to RPA 2-104. NJ BPU Docket No. TO03090705.

Note: ____ reports serving __ residential customers through UNE-Loop, but does not specify where in NJ those customers are located.

The Vast Majority of UNE Loops Reported by CLECs Serve Large Business Customers

CLEC	Total VGE Lines	Lines to Residential Locations	Lines to Business Locations, One Line	Lines to Business Locations, Two Lines	Lines to Business Locations, Three Lines	Lines to Business Locations, Four Lines	Lines to Business Locations, 5- 18 Lines	Lines to Business Locations, 19 or More Lines
Allegiance	30,597	0	983	1,808	2,946	2,364	15,634	6,862

[REDACTED]

[REDACTED]

Total

Sources: CLECs responses to RPA-1, RPA-2, RPA-3, and BPU Staff Switching Questions. NJ BPU Docket No. TO03090705.

Notes: 1) "NA" - "not available." The CLEC did not report the requested information in detail. 2) In one case, the reported total differs from the calculated totals. (____) In addition, reported totals in response to BPU discovery differed slightly from reported totals for RPA discovery for ____ and ____.

**DS0 Lines Served Through Self-Provisioned Switches by CLECs
Serving Both Residential *and* Business Markets**

Wire Centers in Density Zones 1 and 2 - Newark MSA

CLEC 1

CLEC 2

Bus., 1-3	Bus., 4-18	Bus., 19+	Total
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Bus., 1-3	Bus., 4-18	Bus., 19+	Total
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Wire Center	Res. Lines	Lines	Lines	Lines
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Res. Lines Lines Lines Lines

[illegible]

Wire Centers in Density Zones 1 and 2 - Camden MSA

CLEC 1						CLEC 2					
Wire Center	Bus.,		Bus.,		Total	Bus.,		Bus.,		Total	
	1-3	4-18	19+	Lines		1-3	4-18	19+	Lines		
Res. Lines	Lines	Lines	Lines	Lines	Res. Lines	Lines	Lines	Lines	Lines	Res. Lines	Lines
[REDACTED]											
[REDACTED]											
Wire Centers in Density Zone 3 - Newark MSA											
[REDACTED]											
[REDACTED]											
[REDACTED]											
[REDACTED]											
[REDACTED]											
[REDACTED]											
[REDACTED]											
[REDACTED]											

CLEC 1					CLEC 2				
Bus., Bus., Bus.,					Bus., Bus., Bus.,				
1-3 4-18 19+ Total					1-3 4-18 19+ Total				
Wire Center	Res. Lines	Lines	Lines	Lines	Res. Lines	Lines	Lines	Lines	Lines
Wire Centers in Density Zone 3 - Camden MSA									

CLEC 1					CLEC 2				
	Bus.,				Bus.,				
	1-3	4-18	19+	Total	1-3	4-18	19+	Total	
	Res. Lines	Lines	Lines	Lines	Res. Lines	Lines	Lines	Lines	
DZ 1 & 2									
DZ 3									

Sources: Verizon responses to RPA 2-93 and 2-97; CLECs' responses to RPA discovery. NJ BPU Docket No. TO03090705.

Note: Several wire centers serviced by ____ are not listed as part of Verizon's New Jersey territory.

**Most Alleged CLEC Activity Should Be Excluded
From Trigger Analysis Accounting**

Newark MSA - Density Zone 1				
Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines Reason to Exclude
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				
[REDACTED]				

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
Newark MSA - Density Zone 2					
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

<u>Location</u>	<u>CLLI</u>	<u>CLEC</u>	<u>Verizon Line Count</u>	<u>CLEC- Reported Lines</u>	<u>Reason to Exclude</u>
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
Camden MSA - Density Zone 1					
Camden MSA - Density Zone 2					
[REDACTED]					

Location	CLLI	CLEC	Verizon Line Count	CLEC- Reported Lines	Reason to Exclude
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					

Sources: Verizon Supplemental Testimony Attachment 1. NJ BPU Docket No. TO03090705.

Reasons for excluding CLEC from trigger accounting:

- a -The CLEC's presence is negligible (fewer than 20 lines) and therefore should be discounted.
- b - The CLEC's presence is a consequence of a regulatory obligation rather than a business-motivated reason.
- c - CLEC does not provide evidence of providing service to actual customers.

**Despite the Presence of Three or More Self-Provisioning CLECs, the
Self-Provisioning Trigger Is Not Met in Any Wire Center -
At Least Three CLECs Do Not Serve the Entire Mass Market**

<u>CLLI</u>	<u>Location</u>	<u>CLECs</u>	<u>Residential and Small Business</u>
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Sources: Verizon Supplemental Testimony Attachment 1. CLECs responses to RPA 3. NJ
BPU Docket No. TO03090705.